

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Akeel Abdul Jamiel

Write the full name of each plaintiff.

19 cv 01389-UA

(Include case number if one has been assigned)

-against-

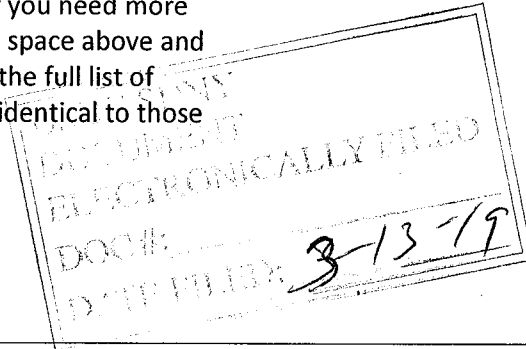
Jennifer Villemin

COMPLAINT

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.



RECEIVED
CLERK'S OFFICE
MAR 13 10:10
S.D. N.Y.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- ☒ **Federal Question**
- ☐ **Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

Fourteenth Amendment. 14th Amendment.

B. If you checked Diversity of Citizenship**1. Citizenship of the parties**

Of what State is each party a citizen?

The plaintiff, New York, is a citizen of the State of
(Plaintiff's name)

New York. New York.
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

New York.

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, Jennifer villemin, is a citizen of the State of
(Defendant's name)

New York,

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

New York.

If the defendant is a corporation:

The defendant, Maison Kayser, is incorporated under the laws of
the State of New York

and has its principal place of business in the State of New York.

or is incorporated under the laws of (foreign state) New York.

and has its principal place of business in New York.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

<u>AKeel</u>	<u>Abdul</u>	<u>Jamiel</u>
First Name	Middle Initial	Last Name
<u>544 Academy Street. Apt #41A</u>		
Street Address		
<u>New York</u>	<u>NY</u>	<u>10034</u>
County, City	State	Zip Code
<u>917-790-9397</u>	<u>AKeelAbdul184@gmail.com</u>	
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

Jennifer villemin

First Name

Last Name

Second operation manager at maison Kayser USA

Current Job Title (or other identifying information)

1535 Third AVE, New York, NY, @ Maison Kayser.

Current Work Address (or other address where defendant may be served)

New York NY

County, City

State

Zip Code

Defendant 2:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 3:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIMPlace(s) of occurrence: 1535 THIRD AVE; New York, NY.Date(s) of occurrence: March 6th, 2019**FACTS:**

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

on March, 6th 2019. @ 10:00 or 10:25 ^{AM} approximately. Ms. Jennifer villemin, arrived at my working location 1535 Third Ave., New York, New York. As she came to check upon a light cover she had replaced in my work area. She were making a whistling gesture whistling to me, supposedly that I am a homo-sexual on the low key. I wrote the incident and turned in to the courts immediately as it's included in here as an exhibit. Ms. Gabriela de la Vega witnessed the situation and tried to warn her about me suing her. But she did not stop.

Now this a plain Sexual harassment.
And Ms. Jennifer villemin is a transgressor,
She needs to be delt with accordingly.
on march 6th, the cameras are rolling and
they are recording. Mason Kayser indeed
knew about the harassments and did
not do anything about it. Therefore I am
Suing Mason Kayser as a corporation
for Sexual harassment and anti gay slurs.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

My self esteem was Sucked out of me.
I felt so mistreated and less of a human.
and belittled.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

I am Seeking the sum of \$50,000,000⁰⁰
for being humiliated and mistreated.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

3-6-2019
 Dated
Akeel Abdul Jamiel
 First Name Middle Initial Last Name
544 Academy Street Apt # 41 A
 Street Address
New York NY 10034
 County, City State Zip Code
917-790-9397
 Telephone Number
Akeelabdul184@gmail.com
 Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:
☐ Yes ☒ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.



United States District Court
Southern District of New York

Pro Se (Nonprisoner) Consent to Receive Documents Electronically

Parties who are not represented by an attorney and are not currently incarcerated may choose to receive documents in their cases electronically (by e-mail) instead of by regular mail. Receiving documents by regular mail is still an option, but if you would rather receive them only electronically, you must do the following:

1. Sign up for a PACER login and password by contacting PACER¹ at www.pacer.uscourts.gov or 1-800-676-6856;
2. Complete and sign this form.

If you consent to receive documents electronically, you will receive a Notice of Electronic Filing by e-mail each time a document is filed in your case. After receiving the notice, you are permitted one "free look" at the document by clicking on the hyperlinked document number in the e-mail.² Once you click the hyperlink and access the document, you may not be able to access the document for free again. After 15 days, the hyperlink will no longer provide free access. Any time that the hyperlink is accessed after the first "free look" or the 15 days, you will be asked for a PACER login and may be charged to view the document. For this reason, *you should print or save the document during the "free look" to avoid future charges.*

IMPORTANT NOTICE

Under Rule 5 of the Federal Rules of Civil Procedure, Local Civil Rule 5.2, and the Court's Electronic Case Filing Rules & Instructions, documents may be served by electronic means. If you register for electronic service:

1. You will no longer receive documents in the mail;
2. If you do not view and download your documents during your "free look" and within 15 days of when the court sends the e-mail notice, you will be charged for looking at the documents;
3. This service does *not* allow you to electronically file your documents;
4. It will be your duty to regularly review the docket sheet of the case.³

¹ Public Access to Court Electronic Records (PACER) (www.pacer.uscourts.gov) is an electronic public access service that allows users to obtain case and docket information from federal appellate, district, and bankruptcy courts, and the PACER Case Locator over the internet.

² You must review the Court's actual order, decree, or judgment and not rely on the description in the email notice alone. See ECF Rule 4.3

³ The docket sheet is the official record of all filings in a case. You can view the docket sheet, including images of electronically filed documents, using PACER or you can use one of the public access computers available in the Clerk's Office at the Court.

500 PEARL STREET | NEW YORK, NY 10007
300 QUARROPAS STREET | WHITE PLAINS, NY 10601

PRO SE INTAKE UNIT: 212-805-0175

CONSENT TO ELECTRONIC SERVICE

I hereby consent to receive electronic service of notices and documents in my case(s) listed below. I affirm that:

1. I have regular access to my e-mail account and to the internet and will check regularly for Notices of Electronic Filing;
2. I have established a PACER account;
3. I understand that electronic service is service under Rule 5 of the Federal Rules of Civil Procedure and Rule 5.2 of the Local Civil Rules, and that I will no longer receive paper copies of case filings, including motions, decisions, orders, and other documents;
4. I will promptly notify the Court if there is any change in my personal data, such as name, address, or e-mail address, or if I wish to cancel this consent to electronic service;
5. I understand that I must regularly review the docket sheet of my case so that I do not miss a filing; and
6. I understand that this consent applies only to the cases listed below and that if I file additional cases in which I would like to receive electronic service of notices of documents, I must file consent forms for those cases.

Civil case(s) filed in the Southern District of New York:

Note: This consent will apply to all cases that you have filed in this court, so please list all of your pending and terminated cases. For each case, include the case name and docket number (for example, John Doe v. New City, 10-CV-01234).

Name (Last, First, MI)

Address

City

State

Zip Code

Telephone Number

E-mail Address

Date

Signature

Return completed form to:

Pro Se Intake Unit (Room 200)
500 Pearl Street
New York, NY 10007

United States District Court
Southern District Of New York

Akeel Abdul Jamiel

-V-

Maison Kayser USA

Abel Viveros, Gabriela De La Vega, Julian Ramirez, Ana Ledesma, Jennifer Villemin

Case# 19 -cv- 01389-UA

I am the Plaintiff in the above mentioned case, submitting additional documents to my recent lawsuit against Maison Kayser and the above aforementioned individuals. I am attaching an Amended complaint adding another individual by the name of Jennifer Villemin.

I were recently harassed by Ms. Villemin for the same exact reason that I'm suing the company for. which is (anti gay slurs) and harassments labeled in exhibit #1. As Maison Kayser Took no action toward the aforementioned individuals.

two weeks later after I submitted my claim Ms. Ana Ledesma started to contact me almost every day for almost a week calling her self she wants to talk to me about my claim. After the fact they were served paper work and were let know they were being sued. She were trying to cover her tracks and the company's as well but that were too late because they failed to address The situation and were very unprofessional and negligent in such matter. Labeled in exhibit #2.

As for the harassments and accusations did not stop as of March 8th. Proof are my recent letter submitted in person to the courts labeled as exhibit #3. Maison Kayser official staff (French) indeed knew about the sexual harassments in regard to sexual orientation from the first mentioned individuals in the beginning of the lawsuit. But chose to do nothing about it and totally Ignored a serious matter. The Spanish continue to destroy my character, as of march 8th I over heard Mr. Ramirez speaking with another Spanish individual about my case and that him and Mr. Viveros planning to get people to testify against me supposedly that I am a gang or in a gang. Supposedly that the case against them will get dismissed if they get as many people as they can to falsely testify. In fact Mr Abel Viveros till this day did not and will not stop slandering Me continuously. They even speaking about my criminal records and letting everyone know about my past. Thats a complete discrimination and a violation of my constitutional rights. All of my coworkers know about me having record thanks to Mr Viveros. As of now I'm being labeled as a rat and a snitch by Mr. Viveros and his friends because I put my case in the law's Hands. I am mentally exhausted from their mental abuse and recently in search of another job So I can resign from my current job.

farther information about Mr. Viveros and maison Kayser as Mr. Viveros used to steal over time from employees as he were told to do so by Maison Kayser head staff. If an employee did four hours over time, will only see 1 hour of over time on his or her pay stub. And proof of that is in their computers, because they change the hours by managers. I have heard an employee by the name of Felix Martinez Franco, who personally cried out to me about how he only got one hour of over time on his pay check after doing like 6 hours of over time.

Another General Manager by the name of Aiesh unknown last name who also happens to be a very close friends of Mr. Viveros, who steal over time from the runners, the employees upstairs. And another employee by the name of Mohammed Haque. Who also confirmed that in fact the managers at Maison Kayser including Ms. Gabriela de la Vega do steal over time from employees. Again proof of that in their computers and may be in their soft ware. I hope it can be recovered even after if they changed it or erase it. I personally were told by the aforementioned Managers that if we don't finish our work on time we will not be paid for over time. If their computers will be examined and traced back to two months or a month back there is a possibility of catching the illegal changes done by the above managers.

One day I informed Mr. Abel Viveros that I am requesting a sick day off and Mr Viveros switched my sick day with my day off so that I won't get paid. This is a complete violation of labor laws and the laws of New York state. Exhibit labeled #4.

As for the individuals that I mentioned complaining from loss of over time, they might testify or might not because they might fear losing their jobs. I believe that Mr Mohammed Haque might testify or might not.

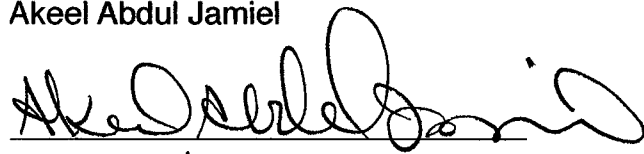
Farther information on the company of Maison Kayser at 1535 Third ave NY NY. That all of the cook in the kitchen do not posses any culinary art certificates nor any food handling licenses as they're required to do so by the State of New York. More over to their violations of labor laws. They suppose to provide Medicaid for their employees, and I have been with them since may of 2018 and I don't have any Medicaid to take care of my health. Labor laws states that employer should provide medicaid for his employees or pay a tax penalty. Exhibit labeled #5

Mr. Abel Viveros, Mr. Julian Ramirez and Ms. Gabriela de la Vega are extremely anti trump. And strongly hate him. I support Mr. Trump for he is the President of the United States.

I humbly thank the United States Court for their great work and time in theses matters.

Plaintiff

Akeel Abdul Jamiel



Date: 3/11/2019

	Witnesses Names	Phone#
1)	Bertin Boston	917-216-5594
2)	Lanita Stinnie	917-709-5553
3)	Wayne Price	unknown
4)	Elijah Ex supervisor	unknown

March 6th, 2019, @ about 10:25 ~~AM~~. Approximately, Ms. Jennifer unknown last name a head staff @ maison Kayser. Were doing the wistling gesture toward me; Caught on quote that I am a homo in the closet. Ms. Jennifer who is the head staff at maison Kayser locations who happen to come to my location like always do, and plainly harassed me at my job. while I were working. It's a Sexual harassment and I would like to press charges against her for sexual harassment. Maison Kayser indeed knew about the harassment coming from my co-workers and now Ms. Jennifer who are a french and head staff harassing me her self.

Exhibit #1

Alexis Abell

RECEIVED
SONY PRO SE OFFICE
2019 MAR -6 PM 4:12

Date: 3-6-19.

EXhibit # 1 & 2

Boost

12:12 AM



All Inboxes

18 Messages
 Anti gay slurs


Found in Gmail Sent Mailbox

**Akeel Abdul**

2/21/19

To: Ana Ledesma

Details



The reason why I put in a claim is
 because you
 Took no action toward the individuals.
 And as far
 As me discussing any matters in regards
 to my claim,
 It would be in court or in writing from the
 corporation's
 Attorney. Not with you. Or else my fifth
 amendment
 Rights would be violated. Although I
 appreciate your
 Concerns but no thanks .

Akeel

Sent from my iPhone



Exhibit #2
 4/19/19

Thank you for writing in. I am sorry to hear these allegations as we do not tolerate such behavior at Maison Kayser. Please allow me to further investigate the situation and get back to you by Thursday this week.

NEW! Le Catering | Order now (212) 300-2100

373 Park Avenue South, 2nd floor
New York, NY 10016

French Bakery | Restaurant | Le Catering | Maisonkayserusa.com | [Facebook](#) | [Instagram](#)

To whom it may concern

[illegible]

Sincerely,

Abstract

007-796-8397

Bent from my iPhone



PAID SICK
LEAVE



THE DEPARTMENT OF CONSUMER AFFAIRS (DCA) ENFORCES NYC'S PAID SICK LEAVE LAW.

Under the Law:

- If you are a for-profit or nonprofit employer with five or more employees, you must provide paid sick leave. If you have four or fewer employees, you must also provide sick leave, but you are not required to pay for sick leave.
- You must give each employee the required Notice of Employee Rights in English and, if available on the DCA website, the employee's primary language.

Since the Law took effect on April 1, 2014, DCA has worked with businesses to address questions and mediate complaints. This guide provides answers to employers' most frequently asked questions to help you better understand the Law.

Q. WHICH OF MY EMPLOYEES ARE COVERED BY THE PAID SICK LEAVE LAW?

- A.** Most employees who work in New York City are covered by the Paid Sick Leave Law. *Even if your business is located outside of New York City, you must provide sick leave to employees who work more than 80 hours per calendar year in New York City.* The Law covers full-time, part-time, temporary, per diem, transitional jobs program, and undocumented workers. It also covers workers who live outside of New York City but work in New York City. Making deliveries or pickups in New York City is considered to be performing work in New York City.

If you aren't sure about employees covered by a collective bargaining agreement, contact the union. Also visit nyc.gov/PaidSickLeave for additional FAQs, which cover collective bargaining agreements.

You must pay

Exhibit # 4

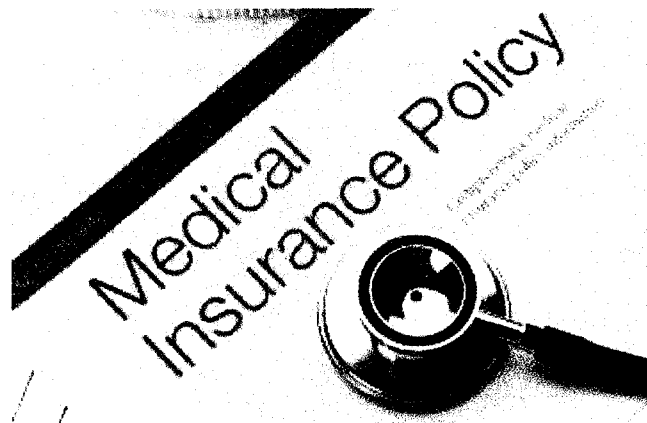
Care Act (ACA), requires certain employers to purchase health insurance or else pay a tax penalty.

EXHIBIT # 5

Q: Does my employer have to provide health insurance?

A: As of January 1, 2015, employers with 50 or more full time equivalent (FTE) employees are required to provide health coverage to full-time employees or else

pay a tax penalty. This is commonly referred to as the employer mandate.



Employers with less than 50 FTE employees are not subject to these tax penalties for not offering health insurance coverage, although if your employer does provide health insurance they might be eligible for tax credits.

Even with the tax penalty, many employers with more than 50 FTE employees will calculate the cost of not providing health insurance and find it is more cost-effective to offer an alternative health insurance solution such as a Health Reimbursement Arrangement (HRA). For example, they may choose to send employees to their state health insurance exchanges. Employers would then provide an HRA to reimburse employees for a portion of their policy.

Looking for a compliant way to offer health insurance reimbursement to your employees?

Check out our free Comprehensive Guide to the Small Business HRA.

State Of New York

AFFIDAVIT OF SERVICE

State Of New York
County Of New York

I, Akeel Abdul Jamiel, being duly sworn, Says and deposes that I am the litigant in this case.

I reside at 544 Academy street Apt 41 A. New York, NY. 10034.

I am over the age of 18 years old.

On this day Monday of March 11th 2019. I enclosed an amended complaint Addressed to the United States District court at 500 pearl street New York, NY.

I completed service by depositing a true copy of the aforesaid documents in a postpaid properly Addressed envelope at a post office or official depository under the exclusive care and custody Of the United States Postal Service.

Akeel Abdul Jamiel

Printed Name

Notary Acknowledgement

State Of New York)
County Of New York) (Seal)
)

The foregoing instrument was acknowledged before me this 11th day Of March 2019, by me Akeel Abdul Jamiel the litigant subscribed to the within instrument.

Akeel Abdul Jamiel

Signature

SEBASTIANO MANCIAMELI

Notary Public - State of New York

No. 01MA6178339

Qualified in Queens County

My Commission Expires December 3, 2019

Notary Public

Before me on 03-11-2019
Sebastiano Manciameli

MAIL ★

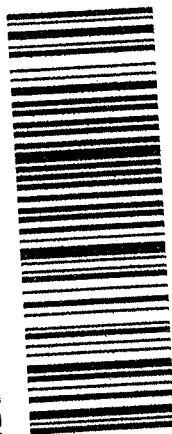
DATE OF DELIVERY SPECIFIED *

PICKUP AVAILABLE

Domestic only

USED INTERNATIONALLY,
CUSTOMS DECLARATION
MAY BE REQUIRED.

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE
CERTIFIED MAIL



7017 0190 0000 8436 6109

USMP3
SDNY

2019 MAR 13 10 20
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RETURN RECEIPT
REQUIRED

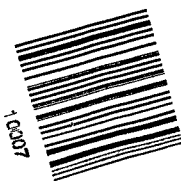
FROM:

Akeed Abdul Jamiel
544 Academy Street Apt #41A
New York, NY 10034

TO: United States District Court
Southern District of New York
500 Pearl Street Pro-Se Rm #105
New York, NY, 10007



1005



10007

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PM 10:48
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